

MARILYN FINE, ESQ.  
Nevada Bar No.: 005949  
mfine@nevadafirm.com  
RACHEL E. DONN, ESQ.  
Nevada Bar No. 010568  
rdonn@nevadafirm.com  
HOLLEY DRIGGS WALCH  
FINE WRAY PUZEY & THOMPSON  
400 South Fourth Street, Third Floor  
Las Vegas, Nevada 89101  
Telephone: 702/791-0308  
*Attorneys for Defendant Equity Title, LLC*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

-o0o-

SHELLEY D. KROHN, CHAPTER 7 TRUSTEE,

Plaintiff,

vs.

EQUITY TITLE LLC, AQUILA MANAGEMENT,  
LLC., WILLIAM WALTER PLISE, ROBERT M.  
EVANS, JAMES L. MOORE AND JOHN DOE,

Defendants.

Case No. 2:14-cv-00620-RFB-PAL

**STIPULATION AND (PROPOSED)  
ORDER TO CONTINUE HEARING  
ON MOTION TO DISMISS FOR  
LACK OF JURISDICTION**

**(FIRST REQUEST)**

Defendant, Equity Title LLC ("Defendant"), by and through its counsel of record, Holley Driggs Walch Fine Wray Puzey & Thompson, and Plaintiff, Shelley D. Krohn, Chapter 7 Trustee ("Plaintiff"), by and through her counsel of record Diamond McCarthy LLP for good cause shown, hereby stipulate and agree that the hearing on the Motion to Dismiss for Lack of Jurisdiction, currently set for July 1, 2015, be continued to the first available Court hearing date after July 23, 2015. This is the parties' first request for an extension.

Defendant filed a Motion to Dismiss on May 22, 2014 (Dkt. No. 14).

Plaintiff filed her Response to Defendant's Motion to Dismiss on June 9, 2014 (Dkt. No. 18).

1 Defendant filed its Reply to the Response to the Motion to Dismiss on June 17, 2014  
2 (Dkt. No. 20).

3 Plaintiff filed a Sur-Reply to Defendant's Motion to Dismiss on June 19, 2014 (Dkt No.  
4 22).

5 On July 24, 2015, the Court issued a Minute Order setting the hearing and oral argument  
6 on the Motion to Dismiss for July 1, 2015.

7 There exists good cause to grant this extension to hear the Motion for the following  
8 reasons:

9 1. An alleged conflict has arisen in this case and Defendant requires  
10 additional time before the hearing to resolve this conflict.

11 2. Plaintiff's counsel will be out of the country from July 4, 2015 through July 23,  
12 2015.

13 Therefore, Defendant and Plaintiff so stipulate that the hearing in on the Motion to  
14 Dismiss for Lack of Jurisdiction be continued to a date after July 23, 2015.

15 IT IS SO STIPULATED.

16 Dated this 29<sup>th</sup> day of June, 2015

17 HOLLEY DRIGGS WALCH  
18 FINE WRAY PUZEY & THOMPSON

19 By: /s/Marilyn Fine

20 MARILYN FINE, ESQ. (SBN 5949)  
21 RACHEL E. DONN, ESQ. (SBN 10568)  
22 400 South Fourth Street, 3<sup>rd</sup> Floor  
23 Las Vegas, NV 89101  
24 *Attorneys for Defendant Equity Title*

Dated this 29<sup>th</sup> day of June 2015

DIAMOND MCCARTHY LLP

By: /s/Kathy Bazoian Phelps

KATHY BAZOIAN PHELPS  
1999 Avenue of the Stars, 11<sup>th</sup> Floor  
Los Angeles, CA 90067  
*Attorneys for Plaintiff*

25 **ORDER**

26 IT IS SO ORDERED.

27 DATED this 30th day of June, 2015.

28 

RICHARD F. BOULWARE, II  
United States District Judge